

**IN THE UNITED STATES DISTRICT COURT FOR  
THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

ADWOWA JACOBS,

Plaintiff,

v.

ELECTRONIC DATA SYSTEMS  
CORPORATION AND JEFF  
WILLIAMS,

Defendants.

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CIVIL ACTION NO.

2:05-CV-925-MHT-SRW

**REPORT OF PARTIES' PLANNING MEETING**

1. Pursuant to Fed. R. Civ. P. 26(f), a meeting was held on February 24, 2006 via teleconference between:

L. D. Walker, III for Plaintiff;

Tonya A. Jacobs for Defendant Electronic Data Systems Corporation ("EDS");  
and

James E. Williams for Defendant Jeff Williams.

2. Pre-Discovery Disclosures. The parties will exchange the information required by FED. R. CIV. P. 26(a)(1) by March 10, 2006.

3. Discovery Plan. The parties jointly propose to the court the following discovery plan:

Discovery will be needed on the following subjects:

Plaintiff's claims of (1) sexual harassment; (2) negligent hiring, training and supervision; (3) wanton hiring, training and supervision; (4) outrage; (5) assault and battery; (6) invasion of privacy; and Defendants' defenses thereto.

All discovery commenced in time is to be completed by November 28, 2006.

A maximum of 25 interrogatories may be served by each party to any other party. Responses are due thirty (30) days after service.

A maximum of ten (10) depositions may be taken by Plaintiff and ten (10) by Defendants. Each deposition, other than that of Plaintiff's and Defendants'

depositions, is limited to a maximum of seven (7) hours unless extended by agreement of parties.

Reports from retained experts under Rule 26(a)(2) are due:

from Plaintiff:	by July 31, 2006
from Defendants:	by August 31, 2006

Supplementations under Rule 26(e) are due within seven (7) days of a party learning that its previous response(s) is in some material respect incomplete or incorrect.

4. Other items.

The parties do not request a conference with the court before entry of the scheduling order.

The parties request a pretrial conference in December 2006.

Plaintiff should be allowed until May 30, 2006 to join additional parties and until May 30, 2006 to amend the pleadings.

Defendants should be allowed until June 30, 2006 to join additional parties and until June 30, 2006 to amend the pleadings.

All potentially dispositive motions should be filed by November 28, 2006.

The possibility of settlement cannot be evaluated before further discovery has been conducted. The parties agree the potential for settlement may be enhanced by use of the following alternative dispute resolution procedure: mediation.

Final lists of witnesses and exhibits under Rule 26(a)(3) should be due from Plaintiff by January 26, 2007 and from Defendants by February 9, 2007.

Parties should have seven (7) days after service of final lists of witnesses and exhibits to list objections under Rule 26(a)(3).

The case should be ready for trial by February 26, 2007 and is expected to take approximately three (3) days or twenty-four (24) hours.

Dated: February 24<sup>th</sup>, 2006

Respectfully submitted,

**Baker & Hostetler LLP**

s/ Tonya A. Jacobs

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